



RECEIVED
JUL 17 2014
OFFICE OF THE ATTORNEY GENERAL
EXECUTIVE BUREAU

76 WOODLAND STREET
METHUEN, MASSACHUSETTS 01844
800-442-6155 OR 978-682-8242
FAX NUMBER 978-975-0468
EMAIL MCS@MASSCHIRO.ORG
WWW.MASSCHIRO.ORG

July 15, 2014

The Honorable Martha Coakley
Attorney General of Massachusetts
Partners Health Care Comment Section
1 Ashburton Place
Boston, Massachusetts 02108

Re: Partners Health Care Comment Period

Dear Madam Attorney General:

The Massachusetts Chiropractic Society, Inc. (MCS) is the membership organization representing doctors of chiropractic and their patients within the Commonwealth of Massachusetts. We are writing regarding Partners Health Care and the public comment period as required by Justice Janet L. Sanders.

We respectfully ask that Partners Health Care be required to make the following changes and accommodations before any such merger is approved in the Commonwealth:

1. Partners Health Care be required to credential and recruit a reasonable number of Doctors of Chiropractic at each of its health care facilities and hospitals;
2. Partners Health Care be required to include chiropractic providers in all of its ACO's;
3. Partners Health Care, through its ownership of Neighborhood Health Plan, be required to reimburse chiropractors for all codes they are licensed to perform in the Commonwealth; and that such reimbursement shall be, at a minimum, on par with Blue Cross reimbursement rates; on par with rates received by physical therapists; and for examination codes 99201, 99202, and 99303 on par with reimbursement rates received by primary care physicians. Presently Neighborhood Health Plan, which is owned by Partners Health Plan, reimburses chiropractors at artificially low rates for these examination codes.

4. Partners Health Plan should be required to offer, through its Neighborhood Health Plan, the same number of visits to Doctors of Chiropractic as they offer to physical therapists for similar diagnosis and treatments. Neighborhood Health Plan discriminates against chiropractors and their patients by offering 60 visits a year for a physical therapist while limiting chiropractic patients with similar conditions and diagnosis to 12 visits a year. As owners of Neighborhood Health plan, Partners should rectify such discrimination.

Thank you for the opportunity to provide input on this important proposal.

Sincerely yours,



Steven C. Saro, D.C.
President



Thomas S. Perrault, Sr., D.C.
Executive Vice President

SCS/sg